

EXXON COMPANY, U.S.A.
P.O. BOX 2024 • HOUSTON, TX 77252-2024

OWNERSHIP

W.L. STONE
REGULATORY AFFAIRS ADVISOR

July 6, 1998

Via facsimile (202) 395-7285

Mr. David Rostker
Desk Officer for the Department of the Interior
Office of Management and Budget
Information and Regulatory Affairs
725 17th St., N.W.
Washington, DC 20503

Exxon Company, U.S.A. Comments on MMS
Collection of Information - Indian Gas
Transportation and Processing Allowances (OMB
Control Number: 1010-0075)

Dear Mr. Rostker:

Exxon welcomes this opportunity to submit written comments on the Minerals Management Service ("MMS") Agency Collection Activities for Gas Transportation and Processing Allowances (OMB Control Number: 1010-0075) for royalties from Indian lands. The request for information was published in the June 5, 1998 Federal Register ("Notice").

Lessees of Indian lands are requested to respond to the Office of Management and Budget ("OMB") on the following questions:

Is this information collection necessary for us [MMS] to properly do our job?

No. Exxon believes that the information collection process (MMS-4109 and MMS-4295) outlined in the Notice is a duplication of information already available or determinable to MMS from the MMS-2014. The MMS-2014 form already provides the volumes and rates used in determining transportation and processing allowances. The rate per unit of volume may, however, need to be calculated. The need for a calculation does not justify the need for two more forms. In addition, as of January 1, 1996, these forms were successfully eliminated from the information collection process for Federal lands.

Have we [MMS] accurately estimated the public's burden for responding to this collection?

Generally, the burden estimate appears correct if the payor has a system they can program to generate these reports. However, if the payor must perform the generation of the forms manually, the burden will undoubtedly be greater than outlined in the Notice.

Can we [MMS] enhance the quality, utility, and clarity of the information we collect?

No. Exxon believes that this is a duplicative effort that will not enhance the quality, utility, or clarity of the information collected. Again, Exxon believes that the information collection process outlined in the Notice is a duplication of information already available or determinable to MMS from the MMS-2014.

Can we [MMS] lessen the burden of this information collection on the respondents by using automated collection techniques or other forms of information technology?

The burden may be lessened by programming the necessary calculation for determining transportation and processing allowance rates from information obtained from the MMS-2014 form into the MMS database. This will create a complete set of information into the MMS database without any duplicate reporting by the payor or any redundant forms processing by the MMS, thus easing the reporting burden and lightening the paper load for all involved.

Exxon urges the MMS and OMB to consider eliminating the forms for the proposed data collection.

C - David S. Guzy
Chief, Rules and Publication Staff
Royalty Management Program
Minerals Management Service
PO Box 25165
MS 3101
Denver, CO 80225-0165

